UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

: NOTICE OF MOTION FOR

SUPPRESSION OF

- against - PHYSICAL EVIDENCE

:

1:22-cr-309 (JPC)

MARCO DRUSKOVICH,

Defendant. :

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SIR:

PLEASE TAKE NOTICE that upon the September 7, 2022 Affirmation of Richard Palma, Esq., the September 8, 2022 affidavit of Marco Druskovich, the annexed exhibits and the accompanying Memorandum of Law, the undersigned will move this Court at the United States Courthouse at Courtroom 12D, 500 Pearl Street, New York, NY 10007-1312 on a date suitable to the Court, for an Order pursuant to Rules 12(b)(3)(C) and 47 of the Federal Rules of Criminal Procedure suppressing the fruit of a post-arrest search of Mr. Druskovich's person on the ground that his arrest was unsupported by probable cause; as well as for leave to submit further motions to the extent necessary to seek relief to which Mr. Druskovich is entitled but of which he is not yet aware and for such other, further and different relief as this Court may deem just, equitable and proper.

Dated: New York, New York September 8, 2022

Richard Palma, Esq.

Richard Palma

To: AUSA Rushmi Bhaskaran Office of the United States Attorney Southern District of New York